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February 28, 2019

Ms. Natalie Creed  
Hazardous Waste Unit Manager  
Idaho Department of Environmental Quality  
1410 North Hilton  
Boise, ID 83706

**RE: US Ecology Idaho (USEI) Site B – IDD073114654**  
***February Monthly Progress Report on Recovery Actions Related to the November 17, 2018 Explosion at the USEI Site B Facility ("Incident")***

Dear Ms. Creed:

As requested in IDEQ's letter dated December 18, 2018, USEI is hereby submitting the monthly progress report for February 2019. This report details the activities undertaken in the recovery process for the month of February.

Throughout the month of February, USEI has performed various operations to evaluate the facility and bring it back to a state of compliance following the Incident. The actions taken in the month of February are outlined below.

After receiving approval from IDEQ on February 7, 2019, USEI began receiving loads of bulk material for direct landfill on February 8, 2019. On February 8, 2019 USEI received three rounds of three trucks each (nine loads total) of non-hazardous material from the RTF. Beginning Monday, February 11, 2019, USEI began receiving four rounds of four trucks each (sixteen loads total) per day. Since February 11, 2019 USEI has also received over-the-road loads of bulk non-hazardous material for disposal from fourteen customers.

**Inspections** – Inspections have been performed as required and documented; any area that could not be entered due to structural damage or due to other safety factors was noted on the inspection form.

In the Quarterly Discrepancy Report for 4<sup>th</sup> Quarter 2018 USEI reported that a number of inspections were missing due to the Incident. During the removal of the Field Tech Office/Firehouse, USEI attempted to retrieve the missing inspections that were located in the Field Tech Office at the time of the Incident. When the building was accessed on February 15, 2019, it was discovered that the majority of the inspections were destroyed and could not be retrieved. USEI is continuing to assess this and will include an update of which inspections were destroyed in the Quarterly Discrepancy Report for 1<sup>st</sup> Quarter 2019.





**Leachate Management** – USEI has completed leachate inspections and removed accumulated leachate as required. Removed leachate has been filtered through the leachate treatment system and has been discharged to site surface impoundments for evaporation. Leachate levels for all areas, including those observed in the Evaporation Pond, continue to be in keeping with levels associated with normal operations.

**Precipitation** – Collected precipitation has been monitored and removed from container storage and RCRA tank areas as needed. All precipitation removed from these areas was discharged to the site surface impoundments for evaporation. All precipitation that could be safely removed from Pad 7 has been removed; a small amount of liquid remains in the subcells after each pumping event due to overhead hazards in the area. Once the remaining overhead hazards are removed the remainder of the water in the subcells will be removed.

Collected precipitation from the Indoor and Outdoor Stabilization facilities that was stored in Tank #3 was sampled on January 29, 2019. Analysis performed on February 5, 2019 (Client ID 983224, Lab Sample ID 19021001-22), was provided to IDEQ in a letter dated February 12, 2019, and confirmed that the liquid meets Land Disposal Restriction requirements. The liquid will be discharged to one of the site surface impoundments for evaporation.

Collected precipitation is continuing to be removed from the Outdoor Stabilization Facility and is currently being discharged to RCRA Tank #2 for storage, as needed. Accumulated precipitation in the collection trenches in front of the Containment Building was removed on February 20 and 27, 2019 and was discharged to Tank #2 for storage. The water is awaiting analysis. Once the liquid has been characterized, it will be appropriately managed, either through stabilization at the Outdoor Stabilization Facility or evaporation in one of the site surface impoundments.

On January 30, 2019 the sumps for Mix Bin #1 (MBT 1) were accessed for sampling. It was noted that the caps had been blown off both ports and that a large amount of water was present in both the primary and secondary sumps. The water level was not measured but was estimated to be approximately 18 inches deep. It has been determined that it is not safe for personnel to enter the area and pump the water from the sumps at this time, due to impacts from the Incident. No further information on the status of the sump water is available for the month of February.

**Container Management** – There were no container movements during the month of February. Containers that become damaged or degraded as a result of the Incident are being managed appropriately by being covered or overpacked as needed. USEI is beginning to prepare loads of containers for shipment to alternative facilities to decrease the inventory on site.

Containers that were within the debris side of the Containment Building at the time of the Incident remain at that location at this time. The building was released by OSHA on January 29, 2019. USEI is evaluating the building further at this time to prepare a Safe Work Plan for removal of the containers prior to commencing work. USEI will provide IDEQ a copy of the Safe Work Plan once it has been finalized.



Treatment bins at the Outdoor Stabilization Facility that were in process at the time of the Incident were covered on December 21, 2018. The in-process bins remain covered at this time. The bins are inspected on a daily basis; water is removed from the tarps and they are re-tightened as needed. The waste will be processed as hazardous waste treatment operations at the facility resume.

**Evidence Material** –Evidence from the Incident remains in storage at Container Storage Area 1 (CSA 1) at this time. This includes tagged debris pieces, various split samples that have been collected, empty drums from the back of the haul truck at the Containment Building, containers of burnt magnesium (WSID # 29857-0) and floor sweeps (WSID # 29853-0), and overpack drums of magnesium fines (the material involved in the explosion, WSID # 29856-0). All remaining containers of magnesium material from Reade Manufacturing Company, the company whose waste stream was being treated when the explosion occurred, remain on site at this time. On January 29, 2019 USEI received a Preservation Request Letter from Bryan Byrd, Special Agent, US EPA-CID. As the analyses of the Incident remain ongoing, the timeframe for storage of these materials is unknown at this time.

Baker Risk has received analytics for samples collected prior to February 1, 2019, and continues to review and analyze these materials in its efforts to determine a cause of the Incident. On February 21, 2019, additional samples were collected and sent to Baker Risk .

**Cleanup Material** – Cleanup of debris continued through most of January. Gathered tin and larger pieces of foam insulation have been placed into roll-off bins; small pieces of foam were bagged and then placed into roll-off bins. The bins were placed into storage at CSA 1. The majority of material outside the footprint of the Containment Building has been cleaned up at this time. Additional material is being cleaned up as it is identified. Additional cleanup within the fenced area around the Containment Building is still needed. This cleanup effort will be undertaken once overhead hazards and debris that might fall has been removed. All cleanup material will be handled in accordance with the site closure plan.

A small amount of additional foam material was picked up in the desert on the south side of the facility during the first week of January. USEI will continue monitoring the area for additional material. No additional material was identified during the February inspection of the fence.

Small amounts of additional material continue to be picked up as they are identified. USEI personnel will continue monitoring the fence line on a weekly basis to ensure material is not exiting the facility.

**Facility Structures** – At this time many of the administration facility structures have been removed and placed into Landfill Cell 15 for disposal. The small storage building located adjacent to the Pad 7 dock, and the Field-Tech Office/Firehouse have also been removed. Where possible, the administration trailers were moved to the landfill as a single unit using heavy equipment, rather than demolishing them in place. Once placed in the landfill, they were covered with inert material and crushed in place.



On February 15, 2019, the roof was removed from the Field-Tech Office/Firehouse for retrieval of documents, equipment, supplies, etc. All materials that could be salvaged were removed; the building was then demolished and placed into the landfill. Removal of the building was completed on February 18, 2019. It has been determined that the slab beneath the building is not sufficient for new construction, so other plans to replace the building are under development.

On February 18, 2019 the storage building by the Pad 7 dock was picked up and moved into a haul truck with heavy equipment prior to removal/relocation of the supplies located in the area. The supplies were moved to a Sea Line container next to the temporary offices. The building was disposed in Landfill Cell 15 in the same manner as the Field-Tech Office/Firehouse.

On January 21, 2019, the PCB Processing Building collapsed due to high wind speeds in light of the damage caused to it by the Incident. The containers of waste material stored in the area were undamaged. On January 23, 2019 all containers were removed to a van trailer for shipment to the US Ecology facility located in Beatty, NV. Once all containers had been removed, the remaining walls and roof were pushed into the footprint and covered with a tarp to eliminate precipitation run-on and run-off to the building footprint. The van load of TSCA containers was shipped to the Beatty, NV facility on February 12, 2019. The building debris will be removed from the area and disposed in Landfill Cell 14 or 15 during the month of March.

On February 22, 2019, the roof was removed from the building where the Environmental Library was located and the contents of the offices and library were removed and placed into storage. All records stored in this area not destroyed in the Incident were retrieved. Removal of the building will likely be completed by close of business March 1, 2019.

The Containment Building sustained major damage in the Incident and will need to be repaired/rebuilt. An initial evaluation of the structure by the insurance company and a structural engineer was performed on the stabilization side of the Containment Building on January 29, 2019. Steel and other building debris will need to be removed before the slab and foundation can be further evaluated. The Debris Side will be evaluated once debris material and containers have been removed and the pad is visible for inspection. US Ecology has retained ABCO Engineers to act as project managers on the removal/closure and reconstruction of the Containment Building facility. Contact information for ABCO Engineers was provided to Mr. Lon Stewart via email on February 27, 2019.

The chain link fencing remains intact around the Containment Building, the administration building complex, and the secured area in CSA 1.

The site vehicle wash building was removed January 8, 2019. Water to the truck wash area was restored on January 16, 2019. Up to January 16, 2019 a portable water source was needed to operate the pressure washer. USEI has received a quote for reconstruction of the Truck Wash building, as well as approval from the insurance adjuster to proceed to rebuild the building. The start date for this project is unknown at this time.



The site water system was partially evaluated/repared on January 16, 2019. One water tank is fully functional and is being used to supply water to the truck wash area. Broken lines at the administration/decon areas were capped during the evaluation and repair on January 16. Further evaluation of the remainder of the water tanks and water system piping are still needed. USEI has received a quote for reconstruction of the Pump House building. USEI's insurance adjuster has given their approval to proceed with the rebuild of the building. The start date for this project is unknown at this time.

Some buildings, such as Pad 7 and the new maintenance shop are structurally sound but will require a large amount of repair in light of damage sustained in the Incident. Repairs on the new shop building began on January 21, 2019 and will continue until complete. All damaged siding and other components have been removed from the shop at this time and reconstruction has begun. The timeframe for repairs to Pad 7 is unknown at this time.

The Old Shop/Quonset hut was previously reported to be minimally damaged. The building was shored up by USEI's contractor NorthStar on January 16, 2019. The building was evaluated by USEI's insurance adjuster on January 29, 2019 and was determined to be a total loss. The building will continue to be used for storage of items until repairs to the New Shop are complete. Items will be removed to the New Shop once repairs are completed by USEI's contractor. Once items have been transferred back to the New Shop, a determination will be made about whether to repair the Old Shop or rebuild it. At a minimum, the Old Shop wood framing will be removed and replaced.

The Outdoor Stabilization Facility office is currently being used to house the fingerprint lab in the near term. Repairs to the office at the Outdoor Stabilization Facility were completed by February 1, 2019. A tentative design for the site laboratory has been drawn up.

A portable shower/toilet unit located in the temporary administration trailer area was put into service on January 10, 2019. The unit contains four separate shower/toilet/sink stations. An additional unit with two more restroom stations (toilet/sink only) is present in the area and has been hooked up to power that was supplied to the area.

**Facility Personnel** – Since USEI's last report an additional three employees have left employment with USEI. An updated facility employee list is included with this letter.

If you have any questions regarding the content of this letter or require additional information, please call me or Rebecca Hogaboam at (208) 834-2275.

Regards,



Jason Evens  
General Manager

cc: Barbara McCullough, EPA Region 10  
Albert Crawshaw, IDEQ  
Peter Purchase, IDEQ  
Brian Gaber, IDEQ  
Curt Ohlsen, IDEQ  
Lon Stewart, IDEQ  
Andrew Marshall, USE

Enclosure



Team Member	Hire Date	Title
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**Transfer, Storage, Disposal Facility**

1	BAILEY, NOEL	12/29/2003	Technical Manager
3	BIRMINGHAM, JACK	5/12/2003	Operations Supervisor
5	CERECERES, TINO	5/15/2006	Approvals Coordinator
6	CHRISTIENSEN, RICK	8/2/1992	Sr Operator
7	CLARK, DAVID	4/8/2013	Customer Service Specialist
8	CUTLER, ROBERT	8/26/2010	Senior Operator
9	EVENS, JASON	3/6/2017	General Manager
10	FERRELL, CASEY	8/19/2002	Lead Operator - landfill
11	HALL, STEPHANIE	6/1/2006	Chemist
12	HARLAN, RACHEL	9/4/2018	Receiving Coordinator
13	HAZELL, LEE	7/25/2011	Operator
14	HERRERA, FREDY	1/11/2016	Operator
15	HOGABOAM, REBECCA	6/1/2015	EH&S Compliance Manager
16	IRELAND, JOSEPH	9/28/2007	Mechanic
17	JENSEN, JUSTIN	2/16/2015	Rad Safety Specialist
19	LAWSON, AYLA	8/21/2017	Receiving Coordinator
20	LAWSON, DEVANI	10/22/2007	Lab Tech
21	LEONARD, CHET	5/1/2006	Senior Operator
22	LINDQUIST, ROBERT	9/1/1999	Mechanic Supervisor
23	LIVINGSTON, SOPHIE	7/21/2008	Transportation Clerk
24	LUTRELL, JENNIFER	12/8/2014	Customer Service Specialist
25	MAGERS, JUDITH	6/14/2006	Office Administrator
26	MARTINEZ, DANIEL	4/4/2005	Operations Supervisor
27	POLLARD, RICKEY	4/15/1987	Operator
28	PROW, JACKIE	5/16/2016	Lab Technician
29	RESNER, ROBERT	3/23/2015	Operator
30	ROBERSON, KENNETH	9/6/1988	Operation Manager
31	RODRIGUEZ, CYNTHIA	6/7/2010	Receiving Coordinator
33	ROGERS, BENJAMIN	6/20/2006	Operator
34	SCHMITZ, CORIAN	2/28/2005	Receiving Lead
35	SCHWAGER, ELIZABETH	4/26/2010	HR Generalist
36	SIMPER, KARLITA	6/13/2011	EH&S Compliance Specialist
37	THEODOZIO, RICHARD	4/11/1988	Sr. Operator
38	VANCE, ROBERT	6/7/1993	Lead Operator
39	WHITTED, DALE	6/28/2005	Mechanic
40	WILSON, DANIEL	1/17/2011	Senior Operator
41	WOODRUFF, DANE	10/31/2005	Operator

**Rail Facility**

1	HASTINGS, JONNY	7/16/2018	Mechanic
2	LOPES, JOAO	9/4/2007	Operator
3	MONASERIO, JOSH	7/25/2005	Lead Operator
4	MORENO, ANDREW	12/2/1996	Operations Supervisor/ Rail Forman
5	SPENCER, JUSTIN	9/25/2007	RTF Operations Supervisor
6	WININGS, ANDY	7/25/2011	Operator